

A. LUIS LUCERO, JR., REGIONAL ATTORNEY
KATHRYN OLSON, SUPERVISORY TRIAL ATTORNEY
TERI HEALY, SENIOR TRIAL ATTORNEY
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
909 FIRST AVENUE, SUITE 400
SEATTLE, WA 98104
TEL: (206) 220-6943

ATTORNEYS FOR PLAINTIFF

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JAN 23 2006

DORSEY & WHITNEY L.L.P.
ANCHORAGE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

UNITED FREIGHT AND TRANSPORT,
INC.,

Defendant.

CIVIL ACTION NO. A01-0225CV (JKS)

EEOC'S SECOND SET OF
INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT UNITED FREIGHT AND
TRANSPORT, INC.

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, plaintiff Equal Employment Opportunity Commission ("EEOC" or "Commission") hereby requests that defendant, United Freight and Transport, Inc. ("United Freight" or "defendant"), respond to the following discovery requests within thirty days from the date of service. Plaintiff requests that the discovery requests followed by the word "answer" be answered separately, fully, and in writing under oath. The responses are to be tendered to the EEOC at its Seattle District Office located at 909 First Avenue, Suite 400, Seattle, Washington 98104-1061.

EEOC v. United Freight and Transport, Inc.
EEOC'S 2nd Set of Discovery to Defendant
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EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
Seattle District Office
909 First Avenue, Suite 400
Seattle, Washington 98104-1061
Telephone: (206) 220-6883
Facsimile: (206) 220-6911
TDD: (206) 220-6882

EXHIBIT 6
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1 REQUEST FOR PRODUCTION NO. 6:

2 Produce all documents relating to the total number of full-time and part-time employees
3 employed by defendant, including all of its subsidiaries and subdivisions, who worked at least 20
4 weeks during calendar years 2003, 2004 and 2005.

5 Answer:

7 REQUEST FOR PRODUCTION NO. 7:

8 Produce copies of defendant's certified financial statements, both annual and quarterly, since
9 January 1, 2003 to the present. If no such documents exist, produce sufficient documentary
10 evidence showing defendants' accounts receivable and accounts payable on a monthly basis from
11 January 1, 2003 to the present.

12 Answer:

14 REQUEST FOR PRODUCTION NO. 8:

15 Produce copies of defendants' federal and state income tax returns for 2003 through present. If
16 defendant's 2005 income tax returns are not available, then produce copies of defendant's
17 estimated tax return.

18 Answer:

20 REQUEST FOR PRODUCTION NO. 9:

21 Produce all documents necessary to ascertain the following from January 1, 2003 to the present:

- 22 (1) the gross revenues of defendant's business;
23 (2) the liabilities of the business;
24 (3) the net profit of the business;
25 (4) the fair market value of defendant's assets;

(5) the amount of liquid assets on hand, which includes amounts that can be reasonably borrowed;

(6) the resale value of the business;

(7) the number of people employed for each calendar year from January 1, 2003 to the present.

Answer:

DATED this 30th day of December, 2005.

A. LUIS LUCERO, JR.
Regional Attorney

JAMES L. LEE
Deputy General Counsel

KATHRYN OLSON
Supervisory Trial Attorney

GWENDOLYN Y. REAMS
Associate General Counsel

TERI HEALY
Senior Trial Attorney

BY: Teri Healy

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

Seattle District Office
909 First Avenue, Suite 400
Seattle, Washington 98104
Telephone (206) 220-6916

Office of the General Counsel
1801 "L" Street NW
Washington, D.C. 20507

Attorneys for Plaintiff

PARTY CERTIFICATION

I, Frank Monfrey, swear under oath and the penalty of perjury that I have read the above and foregoing requests for production and the documents provided in response thereto; know the contents thereof and believe the same to be true and correct and are offered in conformance with FRCP 26.

DATE

Frank Monfrey

ATTORNEY CERTIFICATION

The undersigned attorney for defendant has read the above and foregoing requests for production and the documents provided in response thereto and they are in compliance with FRCP 26(g).

Dated this _____ day of _____, 2004

William Evans ASBA# _____

Attorney for Defendant

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TDD: (206) 220-6882